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E-filing

8 Attorneys for Plaintiff JAMES MURRAY

9  
10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 JAMES MURRAY, ) No. C 04-3707 MMC  
14 Plaintiff, ) **E-FILING CASE**  
15 v. ) **STIPULATION FOR PROTECTIVE ORDER**  
16 UNITED STATES OF AMERICA, ) **FOR TRADE SECRET**  
17 Defendant. ) [FRCP, Rule 26(c) (7)]

18 IT IS HEREBY STIPULATED by the parties hereto, through their  
19 respective counsel that any and all financial information produced  
20 by Plaintiff JAMES MURRAY pursuant to discovery requests in this  
21 litigation, including, but not limited to: income information;  
22 financial information; investor information; customer lists;  
23 customer contacts; correspondence; proposals; notes; memoranda;  
24 commissions or draws received and from whom; referrals paid;  
25 commission negotiations and any other writing as defined by  
26 Evidence Code §250; are "**TRADE SECRET OR OTHER CONFIDENTIAL**  
**RESEARCH**" as defined by Federal Rules of Civil Procedure, Rule  
27 26(c) (7).

28 THE PARTIES FURTHER STIPULATE that a protective order is  
necessary that this court may issue a protective order limiting

1 the dissemination of the parties' respective trade secrets  
2 pursuant to Federal Rules of Civil Procedure Rule 26(c)(7) as  
3 follows:

4 1. The trade secret may be disseminated only to counsel for the  
5 parties, including their associate attorneys, paralegals and  
6 investigators, consultants and retained experts;

7 2. The parties may view disclosed trade secret only in the  
8 presence of their respective counsel, or if not in the  
9 presence of their respective counsel, at counsel's office;

10 3. Any party seeking to show the trade secret, or articles  
11 containing the trade secret, to any person not designated by  
12 this protective order without either the notice and consent of  
13 the owner of the trade secret or shall first obtain this  
14 court's approval to do so;

15 4. No articles disclosing the trade secret shall be filed or  
16 otherwise made a part of the court record available to the  
17 public without approval of the court and prior notice to the  
18 owner of the trade secret; and,

19 5. The court may issue other orders as it deems necessary to  
20 protect the integrity of the trade secret.

21 THE PARTIES FURTHER STIPULATE that any breach of this order,  
22 or disclosure, may be considered contempt of a lawful court order.

23 DATED: September 12, 2005

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25 MICHAEL S. KECK  
26 Law Offices of C. L. Keck  
27 Attorney for Plaintiff

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1 DATED: September 12, 2005 23  
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4 OWEN MARTINAN  
5 Assistant US Attorney  
6 Attorney for Defendant

7 IT IS SO ORDERED.  
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1 DATED: September 12, 2005  
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4 OWEN MARTIKAN  
5 Assistant US Attorney  
6 Attorney for Defendant

7 IT IS SO ORDERED.  
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10 DATED: FEB 24 2006, 2005  
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12 JUDGE, of the Court  
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